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7 CALIFORNIA SPORTFISHING PROTECTION ALLIANCE
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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
ROBERT T. MATSUI FEDERAL COURTHOUSE

11 CALIFORNIA SPORTFISHING
PROTECTION ALLIANCE,

Plaintiff,
v.

14 JEFFREY MACCOMBER, in his
15 official capacity as Secretary of
the California Department of
Corrections and Rehabilitation

17 || Defendant

18 COUNTY OF AMADOR, a public agency
of the State of California

20 Plaintiff,
v.

21 JEFFREY MACCOMBER in his official
22 capacity as Secretary of the
23 California Department of
24 Corrections and Rehabilitation;
25 PATRICK COVELLO in his official
26 capacity of Warden of California
Department of Corrections and
Rehabilitation Mule Creek State
Prison.

27 Defendants

Case No.: 2:20-cv-02482-WBS-AC
[cons. w/2:21-cv-00038-WBS-AC]

**STIPULATION TO ENTER [PROPOSED]
CONSENT DECREE**

Judge: Hon. William B. Shubb

Action Filed: Jan. 7, 2021

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17 COUNTY OF AMADOR

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1 Plaintiffs CALIFORNIA SPORTFISHING PROTECTION ALLIANCE and
2 COUNTY OF AMADOR (collectively, "Plaintiffs") and Defendants
3 JEFFREY MACCOMBER, in his official capacity as Secretary of the
4 California Department of Corrections and Rehabilitation, and
5 PATRICK COVELLO, in his official capacity of Warden of California
6 Department of Corrections and Rehabilitation Mule Creek State
7 Prison, by and through their respective counsel, hereby stipulate
8 to the entry of the [Proposed] Consent Decree attached hereto as
9 **Exhibit A**, as set forth below:

10 WHEREAS, on May 25, 2023, Plaintiffs filed a Notice of
11 Settlement notifying the Court that the parties reached a settlement
12 in this matter and that the [Proposed] Consent Decree had been sent
13 to the U.S. Department of Justice ("DOJ") and the U.S. Environmental
14 Protection Agency for a 45-day review period as required by 33
15 U.S.C. section 1365(c) (Dkt. 128).

16 WHEREAS, on June 30, 2023, DOJ notified counsel by letter that
17 the United States does not object to the Court's entry of the
18 Consent Decree into judgment, attached hereto as **Exhibit B**.

19 WHEREAS, the Court may now enter the [Proposed] Consent Decree,
20 which includes a request that the Court retain jurisdiction to
21 enforce the terms of the [Proposed] Consent Decree if necessary.

22 THEREFORE, the Parties hereby request the Court sign the
23 [Proposed] Consent Decree, a true and correct copy of which is
24 attached as **Exhibit A**, and enter the Consent Decree as judgment.

25 The Parties further request that, after entering the
26 [Proposed] Consent Decree as judgment, the Court execute the
27 Proposed Order attached hereto as **Exhibit C**, dismissing Plaintiffs'

1 Dated: July 7, 2023

HARRISON, TEMBLADOR,
HUNGERFORD & GUERNSEY LLP

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By: s/ Adam K. Guernsey

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ADAM K. GUERNSEY

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SEAN K. HUNGERFORD

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Attorneys for Defendants

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JEFFREY MACCOMBER &

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PATRICK COVELLO

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I attest that concurrence in the filing of this document has
been obtained from all signatories indicated above.

10 Dated: July 7, 2023

AQUA TERRA AERIS LAW GROUP

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s/ Erica A. Maharg

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Erica A. Maharg

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